

AFFIDAVIT OF COMPLAINT

STATE ELECTIONS ENFORCEMENT COMMISSION

Revised July 2012

Page 1 of 6



Please complete this form to the fullest extent possible.

The following sections are required and must be completed in full:

I. Identity of Complainant(s)—page 1 | III. Violation(s) Alleged—page 3 | VI. Certification—page 6

I. IDENTITY OF COMPLAINANT(S)

COMPLAINANT'S NAME

First Name Susan	MI A.	Last Name Koneff	Suffix
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COMPLAINANT'S STREET ADDRESS

Address
7 Georges Lane

City Monroe	State CT	Zip Code 06468
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COMPLAINANT'S TELEPHONE NUMBER

Home 203-261-8873	Work 203-452-2820	Cell 203-450-1448
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COMPLAINANT'S EMAIL ADDRESS

koneff@sbcglobal.net

COMPLAINANT'S NAME

First Name Alan	MI D	Last Name Vaglivelo	Suffix
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COMPLAINANT'S STREET ADDRESS

Address
25 School Street

City Monroe	State CT	Zip Code 06468
----------------	-------------	-------------------

COMPLAINANT'S TELEPHONE NUMBER

Home 203-445-2832	Work	Cell 203-556-1322
----------------------	------	----------------------

COMPLAINANT'S EMAIL ADDRESS

vaglivelo@gmail.com

COMPLAINANT'S NAME

First Name	MI	Last Name	Suffix
------------	----	-----------	--------

COMPLAINANT'S STREET ADDRESS

Address

City	State	Zip Code
------	-------	----------

COMPLAINANT'S TELEPHONE NUMBER

Home	Work	Cell
------	------	------

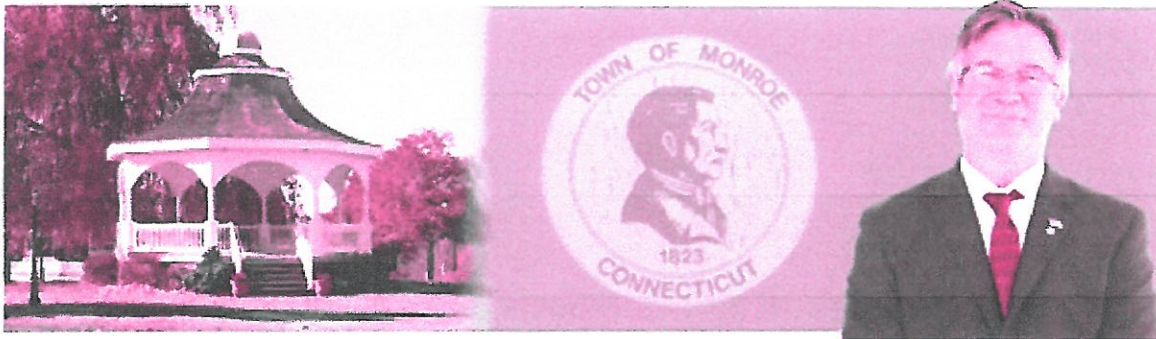
COMPLAINANT'S EMAIL ADDRESS

Susan Koneff

From: Steve Vavrek on behalf of Steve Vavrek
To: Susan Koneff
Cc:
Subject: The Stakes are High
Attachments:

Sent: Thu 7/25/2013 10:55 AM

Is this email not displaying correctly?
[View it in your browser.](#)



www.vavrekformonroe.com

Dear friends,

Monroe's future is at stake and I need your help to keep moving us in the right direction.

I am proud to have received my party's nomination to run for re-election as Monroe's First Selectman. I am committed to running a strong campaign that touts our great RESULTS we have achieved over the last four years and your contribution can help me do that.

The truth is that things in Monroe are better than ever. We have made significant improvements to roads, buildings and infrastructure. We have continued to fund our schools appropriately so that our students can succeed. And when our friends in Newtown needed our support, we were there for their children in an instant.

In short, this administrations leadership has gotten things done and we will continue to do so. That is why it is so important that I have your financial support.

Exhibit A

Election Day, November 5th will be here before we know it. Your contribution today can get us on the right track to victory in November.

Sincerely,

Steve Vavrek
First Selectman

PS -- With your help we can continue to move Monroe in the right direction, please consider making a donation today! Thank you for all your help.

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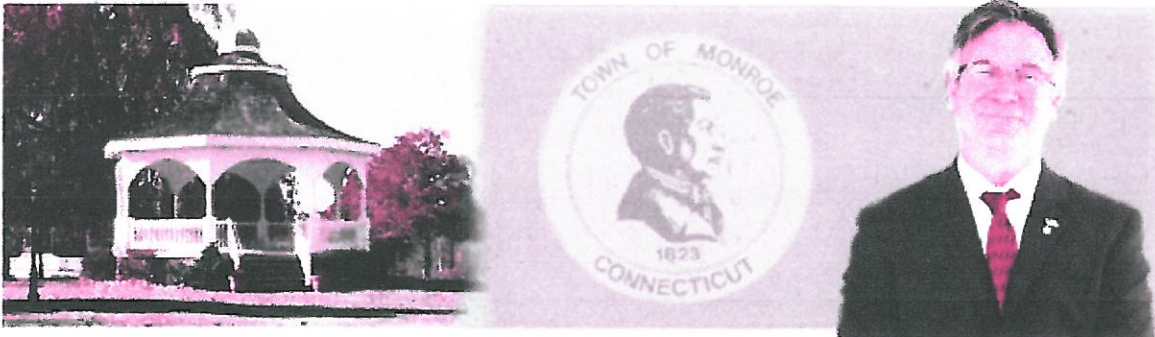
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Exhibit B

From: Steve Vavrek [mailto:vavrekformonroe@gmail.com@mail64.atl11.rsgsv.net] **On Behalf Of** Steve Vavrek
Sent: Wednesday, August 14, 2013 12:34 PM
To: Susan Koneff
Subject: Cocktail Reception and Dancing at Whitney Farms

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Please join us September 20 at Whitney Farms for a night of fun and dancing. For more information please see the invite below.

To rsvp please do so to vavrekformonroe@gmail.com. To pay in advance or by credit card, please click [here](#)!

Thank you for your continued support.

Steve Vavrek
First Selectman - Monroe

PS - Thank you for your continued support. please click here to continue the momentum!



**PLEASE JOIN US FOR A COCKTAIL RECEPTION, LIGHT
HORS D'OEUVRES AND DANCING**

**TO BENEFIT FIRST SELECTMAN
STEVE VAVREK**

**FRIDAY, SEPTEMBER 20, 2013
6:00 PM**

**AT WHITNEY FARMS GOLF COURSE
175 SHELTON RD
MONROE, CONNECTICUT**

**\$40 PER PERSON/\$65 PER COUPLE
SUGGESTED CONTRIBUTION**

**RSVP TO VAVREKFORMONROE@GMAIL.COM
OR BY CONTRIBUTING AT
WWW.VAVREKFORMONROE.COM**

**PAID FOR BY VAVREK FOR MONROE, TERRY ROONEY, TREASURER, APPROVED
BY STEVE VAVREK**

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*Paid for By Vavrek for Monroe, Terry Rooney Treasurer, Approved
by Steve Vavrek.*

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A Gmail message has been moved to your inbox

The Stakes are High

Exhibit C

Don and Sue Koneff <koneff@sbcglobal.net>
Reply-To: Don and Sue Koneff <koneff@sbcglobal.net>
To: Nick Kapoor <kapoom555@gmail.com>
Cc: "koneff@sbcgobal.net" <koneff@sbcgobal.net>

Fri, Jul 26, 2013 at 3:28 PM

Nick,

Please print this out for me and bring it to the meeting tomorrow. When I try to print it out at home, it cuts off the email info which I need for my complaint.

Thanks

Sue

----- Forwarded Message -----

From: Steve Vavrek <vavrekformonroe@gmail.com>
To: koneff@sbcglobal.net
Sent: Thursday, July 25, 2013 10:55 AM
Subject: The Stakes are High

Is this email not displaying correctly?
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[http://vavrekformonroe.us7.list-manage1.com/track/click?
u=d163cc3acdb82ef374e1d640f&id=a359c1438c&e=f31fa33828](http://vavrekformonroe.us7.list-manage1.com/track/click?u=d163cc3acdb82ef374e1d640f&id=a359c1438c&e=f31fa33828)

Dear friends,

Monroe's future is at stake and I need your help to keep moving us in the right direction.

I am proud to have received my party's nomination to run for re-

election as Monroe's First Selectman. I am committed to running a strong campaign that touts our great RESULTS we have achieved over the last four years and your contribution can help me do that.

The truth is that things in Monroe are better than ever. We have made significant improvements to roads, buildings and infrastructure. We have continued to fund our schools appropriately so that our students can succeed. And when our friends in Newtown needed our support, we were there for their children in an instant.

In short, this administrations leadership has gotten things done and we will continue to do so. That is why it is so important that I have your financial support.

Election Day, November 5th will be here before we know it. Your contribution today can get us on the right track to victory in November.

Sincerely,

Steve Vavrek
First Selectman

PS - With your help we can continue to move Monroe in the right direction, please consider making a donation today! Thank you for all your help.

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1-800-4-A-STATE
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Fwd: FW: The Stakes are High

FROM Alan Vaglivelo TO You

[Hide Details](#)

From

- [Alan Vaglivelo](#)
-

To

- [DONALD KONEFF](#)

----- Forwarded message -----

From: **Alan Vaglivelo** <avaglivelo@monroeeps.org>

Date: Mon, Aug 5, 2013 at 6:27 PM

Subject: FW: The Stakes are High

To: vaglivelo@gmail.com

Exhibit E

Alan Vaglivelo, Ed.D.
BOE Member

-----Original Message-----

From: Steve Vavrek on behalf of Steve Vavrek

Sent: Thu 7/25/2013 10:55 AM

To: Alan Vaglivelo

Subject: The Stakes are High

[http://us7.campaign-
archive1.com/?u=d163cc3aadb82e1374e1d640f&id=8173ebf40e&e=c71e61eeb6](http://us7.campaign-archive1.com/?u=d163cc3aadb82e1374e1d640f&id=8173ebf40e&e=c71e61eeb6)
www.vavrekformonroe.com

Dear friends,

Monroe's future is at stake and I need your help to keep moving us in the right direction.

([http://vavrekformonroe.us7.list-
manage.com/track_click?u=d163cc3aadb82e1374e1d640f&id=1b7523b375&e=c71e61eeb6](http://vavrekformonroe.us7.list-manage.com/track_click?u=d163cc3aadb82e1374e1d640f&id=1b7523b375&e=c71e61eeb6))

I am proud to have received my party's nomination to run for re-election as Monroe's First Selectman. I am committed to running a strong campaign that touts our great RESULTS we have achieved over the last four years and your contribution can help me do that.

The truth is that things in Monroe are better than ever. We have made significant improvements to roads, buildings and infrastructure. We have continued to fund our schools appropriately so that our students can succeed. And when our friends in Newtown needed our support, we were there for their children in an instant.

In short, this administrations leadership has gotten things done and we will continue to do so. That is why it is so important that I have your financial support. (<http://vavrekformonroe.us7.list-manage.com/track/click?u=d163ee3aedb82ef374e1d640f&id=159e991d5a&e=c71e61eeb6>)

Election Day, November 5th will be here before we know it. Your contribution today (<http://vavrekformonroe.us7.list-manage1.com/track/click?u=d163ee3aedb82ef374e1d640f&id=a83a1d9854&e=c71e61eeb6>) can get us on the right track to victory in November.

Sincerely,

Steve Vavrek
First Selectman

PS - With your help we can continue to move Monroe in the right direction, please consider making a donation today! Thank you for all your help. (<http://vavrekformonroe.us7.list-manage1.com/track/click?u=d163ee3aedb82ef374e1d640f&id=4543bb5a4e&e=c71e61eeb6>)

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Our mailing address is:
70 Knapp Rd. Monroe, CT

** (<http://vavrekformonroe.us7.list-manage.com/track/click?u=d163ee3aedb82ef374e1d640f&id=8e51a20213&e=c71e61eeb6>)

** follow on Twitter (Twitter Account not yet Authorized

)

** forward to a friend (<http://us7.forward-to-friend2.com/forward?u=d163ee3aedb82ef374e1d640f&id=8173ebf40e&e=c71e61eeb6>)

** unsubscribe from this list (<http://vavrekformonroe.us7.list-manage.com/unsubscribe?u=d163ee3aedb82ef374e1d640f&id=3fd7515292&e=c71e61eeb6&e=8173ebf40e>)

** update subscription preferences (<http://vavrekformonroe.us7.list-manage1.com/profile?u=d163ee3aedb82ef374e1d640f&id=3fd7515292&e=c71e61eeb6>)

This email was sent to avaghlivelo@monroeps.org

why did I get this? (<http://vayrekformonroe.us7.list-manage.com/about?u=d163ee3acdb82ef374e1d640f&id=3fd7515292&e=c71e61eeb6&e=8173ebf40e>) unsubscribe from this list (<http://vayrekformonroe.us7.list-manage.com/unsubscribe?u=d163ee3acdb82ef374e1d640f&id=3fd7515292&e=c71e61eeb6&e=8173ebf40e>) update subscription preferences (<http://vayrekformonroe.us7.list-manage.com/profile?u=d163ee3acdb82ef374e1d640f&id=3fd7515292&e=c71e61eeb6>)

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");



III. VIOLATION(S) ALLEGED

DATE(S) OF ALLEGED VIOLATION(S) *(If known)*

July 25, 2013 and August 14, 2013

CONCISE STATEMENT OF FACTS

Please be as specific as possible with regard to time, place, and the individual(s) taking actions or failing to act, and in describing their actions as well as other witnesses or persons involved. If applicable, please clearly refer to the names of identified respondents, witnesses, and attached evidence (e.g., See Evidentiary Attachment B.). If you have identified more than one respondent, please identify which respondent is alleged to have committed which action and which specific alleged violation of the statutes.

If you are unable to provide the specific identity of any witnesses in the following **"Witnesses"** section, please provide as much identifying information as possible in the below **"Concise Statement of Facts."**

The respondent(s) allegedly violated the law as follows:

On July 25, 2013, Steven Vavrek, the first selectman of Monroe, emailed me at my work email at the Monroe Town Hall soliciting a donation for his upcoming campaign for re-election. (A copy of the email attached is Exhibit A) On August 14, 2013, Mr. Vavrek emailed me once again at my work email; this time inviting me to a fund raiser for his campaign. (A copy of the email attached is Exhibit B) I am the registrar of voters in Monroe and Mr. Vavrek is my supervisor.

Mr. Vavrek also sent the same two emails mentioned above to my home email address. (copy of the donor solicitation letter of July 25, 2013 is Exhibit C, and copy of the fund raiser email of August 14, 2013, is Exhibit D) I have never provided my email address to Mr. Vavrek for campaign purposes. I have communicated with Mr. Vavrek using my home email address for Town business purposes and my home email address is registered on the Town of Monroe listserv database for Town of Monroe communications. I signed up for the listserv in order to receive notification about events and information pertaining to the Town, not for the First Selectman's political use.

*Use attached page(s) for additional statement of facts if necessary.
Please check "See attached Additional Statement of Facts" and list the number of pages.*

☒ See attached 2 Additional Statement of Facts pages
Number of Pages



ADDITIONAL STATEMENT OF FACTS

Page 2 of 2

CONCISE STATEMENT OF FACTS *continued*

I believe Mr. Vavrek has deliberately misappropriated my email address from lists maintained by the Town of Monroe for Town business purposes and used them for his own personal political gain. The misuse of Town email addresses and personal addresses to solicit political contributions from Town employees/ officials is at the very least unethical and quite possibly a violation of state statutes.

Susan A. Koneff

On July 25, 2013, Steven Vavrek, the first selectman of Monroe, emailed me at my (elected official, Board of Education member,) town email soliciting a donation for his upcoming campaign for re-election (A copy of this email attached is Exhibit E) Every elected official in the Town is provided with an email address to conduct official business for the Town. I believe that Mr. Vavrek has deliberately misused my Town email for his own political purposes. While he may state that his campaign is at fault, I contend that since he provided the email addresses to his campaign he is at fault. This misuse appears to me to be unethical and may in fact be a violation of state statute.

Alan Vaglivelo



VI. CERTIFICATION

- 1) Each Complainant must sign a separate page and each signature must be separately certified. This complaint will not be considered filed without the name, address, and original **certified** signature of at least one Complainant. Mail or hand-deliver this complaint to:

State Elections Enforcement Commission
20 Trinity Street, Suite 101
Hartford, CT 06106

- 2) Once filed, this complaint may not be withdrawn by the Complainant(s) except by a vote of the State Elections Enforcement Commission.
- 3) I am aware that criminal penalties may be imposed upon any Complainant who, under penalty of false statement, knowingly files a false complaint.
- 4) The State Elections Enforcement Commission's investigation of a complaint is confidential unless and until the State Elections Enforcement Commission votes to authorize an investigation of a complaint. Until such a vote, neither the Commission nor its staff will release or confirm any information about the complaint except upon written request of a treasurer, deputy treasurer, chairperson or candidate affiliated with a committee that is the subject of the complaint or preliminary investigation.

Guides to the elections laws are available at <http://www.ct.gov/seec>
Connecticut General Statutes are available at <http://www.cga.ct.gov>

CERTIFICATION

**I solemnly swear (or affirm) that the above statement is true and accurate
to the best of my knowledge and belief.**

Swane A. Koneff
COMPLAINANT'S SIGNATURE

08-05-2013
DATE (mm/dd/yyyy)

Sworn and subscribed before me on this 5 day of August, 2013

Seal

Patricia A. Tornchik
SIGNATURE OF PERSON ADMINISTERING THE OATH

PATRICIA A. TORNCHIK
NAME OF PERSON ADMINISTERING THE OATH (Please Print)

Justice of the Peace
TITLE OF PERSON ADMINISTERING THE OATH

Note: This oath may be administered by anyone authorized by Section 1-24 of the Connecticut General Statutes, which includes: notaries public; justices of the peace; town clerks and assistant town clerks; judges and clerks of any court; and attorneys who are Commissioners of the Superior Court of Connecticut.



VI. CERTIFICATION

- 1) Each Complainant must sign a separate page and each signature must be separately certified. This complaint will not be considered filed without the name, address, and original **certified** signature of at least one Complainant. Mail or hand-deliver this complaint to:

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Connecticut General Statutes are available at <http://www.cga.ct.gov>

CERTIFICATION

**I solemnly swear (or affirm) that the above statement is true and accurate
to the best of my knowledge and belief.**


COMPLAINANT'S SIGNATURE

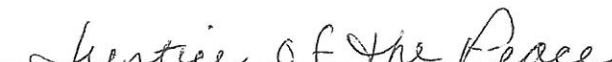
8-6-13
DATE (mm/dd/yyyy)

Sworn and subscribed before me on this 6 day of August, 2013

Seal


SIGNATURE OF PERSON ADMINISTERING THE OATH


NAME OF PERSON ADMINISTERING THE OATH (Please Print)


TITLE OF PERSON ADMINISTERING THE OATH

Note: This oath may be administered by anyone authorized by Section 1-24 of the Connecticut General Statutes, which includes: notaries public; justices of the peace; town clerks and assistant town clerks; judges and clerks of any court; and attorneys who are Commissioners of the Superior Court of Connecticut.